

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:

GLOBAL WOUND CARE MEDICAL GROUP, a  
Professional Corporation,<sup>1</sup>

Debtor and Debtor in Possession.

Chapter 11

Case No. 24-34908 (CML)

**JOINT NOTICE OF EXTENSION OF STIPULATION AND AGREED ORDER  
REGARDING SUSPENSION OF MEDICARE PAYMENTS TO THE DEBTOR BY THE  
UNITED STATES DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**PLEASE TAKE NOTICE** that, on December 19, 2024, the Court approved that *Stipulation and Agreed Order Regarding Suspension of Medicare Payments to the Debtor by the United States Health and Human Services* [Docket No. 87] (the “Stipulation”) between Global Wound Care Medical Group, a Professional Corporation, the debtor and debtor in possession in the above-captioned case (the “Debtor”), on the one hand, and, the Civil Division of the United States Department of Justice (the “DOJ”), on behalf of the United States of America, the United States Department of Health and Human Services (“HHS”) and its designated component, the Centers for Medicare and Medicaid Services (“CMS” and, collectively, with HHS and DOJ, the “United States”), on the other hand.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to paragraph 10 of the Stipulation, the DOJ has sole discretion to extend the term of the Stipulation beyond December 31, 2024, that the DOJ previously agreed to extend the Stipulation through and including February 28, 2025

<sup>1</sup> The last four digits of the Debtor’s tax identification number in the jurisdiction in which it operates is 3572.



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[Docket No. 119], and that DOJ has now further agreed to extend the Stipulation through and including March 14, 2025.

**PLEASE TAKE FURTHER NOTICE** that the Debtor and the DOJ have agreed to extend the date in paragraph 5(d) of the Stipulation from June 30, 2025 through and including July 14, 2025, and the date in paragraph 6(a) of the Stipulation from February 28, 2025 to March 14, 2025.

**PLEASE TAKE FURTHER NOTICE** that the Debtor and the DOJ have agreed to extend any deadline for the United States to file a proof of claim in the above-captioned bankruptcy case through and including July 14, 2025.

**PLEASE TAKE FURTHER NOTICE** that an Operating Budget (as defined in the Stipulation) is attached hereto as **Exhibit “A.”**

**PLEASE TAKE FURTHER NOTICE** that, in light of the Stipulation, the Debtor has agreed that no further action needs to be taken during the term of the Stipulation, including any extensions thereof, regarding the rebuttal letter to CMS dated October 11, 2024.

**PLEASE TAKE FURTHER NOTICE** that, except as provided herein, all terms set forth in the Stipulation and any prior Notices extending the Stipulation remain in full force and effect as if set forth in full in this Notice.

*[Signature page to follow]*

Dated: February 28, 2025

Respectfully submitted,

**DENTONS US LLP**

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*Counsel for the United States*

**CERTIFICATE OF SERVICE**

This is to certify that I have on February 28, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Casey W. Doherty Jr.

**EXHIBIT A**

**Global Wound Care Medical Group and Wound Pros Management Group**  
**2-Week Operating Budget**  
**Period Ended March 15, 2025**

<b>WEEK ENDED</b>	<b>3/8/2025</b>	<b>3/15/2025</b>	<b>2 Week TOTAL</b>
Biologics Product Expenses	\$ 21,414,869	\$ 633,960	\$ 22,048,829
Other Cost of good sold	984,899	220,238	1,205,137
Payroll Expense	2,721,452	544,138	3,265,590
Rent Expenses	70,496	1,643	72,139
Admin Expense	360,407	391,966	752,373
Insurance Expense	13,931	13,931	27,861
Services Cost	621,877	1,890,003	2,511,880
Software Expense	448,894	191,691	640,585
Travel Expenses	134,424	134,424	268,848
Marketing and Sales Expenses	101,485	47,485	148,970
<b>Total Operating Expenses</b>	<b>\$ 26,872,734</b>	<b>\$ 4,069,478</b>	<b>\$ 30,942,212</b>